

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.) CRIMINAL NO.: 17-10305-ADB-MPK
JOSEPH BAPTISTE,)
Defendant.)

JOINT MEMORANDUM FOR INITIAL STATUS CONFERENCE

The parties submit this joint memorandum addressing the issues set out in Local Rule 116.5(A).

1. Status of Discovery

The government has produced automatic discovery as well as additional materials to the defendant. The government has requested reciprocal discovery. There are no discovery requests pending. The defendant is in the process of reviewing the materials produced by the government and needs additional time to complete this review.

2. Additional Discovery to Be Produced

The government has provided the defendant with a declination letter pursuant to LR 116.6. There is no additional discovery to be produced at this time.

3. Timing of Additional Discovery Requests

The defendant reserves his right to request additional discovery after he completes his review of the discovery produced to date.

4. Protective Orders

There is no protective order at this time.

5. Timing of Any Pre-Trial Motions Under Fed. R. Crim. P. 12(b)

The government will ask for a briefing schedule at the next status conference.

6. Expert Witness Disclosures

The parties request that the Court order that expert witness discovery be produced no later than 30 days prior to trial in this matter, with reciprocal discovery to be produced no later than 15 days before trial.

7. Excludable Delay

The parties jointly ask the Court to exclude the time from November 14, 2017, until the date of the next status conference, under 18 U.S.C. § 3161(h)(7)(A), to permit the defendant to review the discovery in this case. The ends of justice served by this exclusion outweigh the interests of the public and the defendant in a speedy trial.

8. The Timing of an Interim Status Conference

The parties request an interim status conference on or about December 18, 2017, or at such time as is convenient to the Court.

Respectfully submitted,

JOSEPH BAPTISTE
Defendant

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: November 14, 2017

/s/ Stephen E. Frank
Stephen E. Frank